Jennifer R Dartez State Bar No. 33795 ALLMAND LAW FIRM, P.L.L.C. 860 Airport Freeway, Suite 401 Hurst, TX 76054 214.265.0123 Phone 214.265.1979 Fax

ATTORNEY FOR DEBTOR(S)

## IN THE UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF TEXAS DISTRICT FORT WORTH DIVISION

IN RE:	§	<b>CASE NO. 16-42177</b>
	§	CHAPTER 13
COREY WAYNE SAUERS	<b>§</b>	
SUMER DAWN SAUERS	§	
Debtors.	§	

## MOTION FOR SUBSTITUTION OF COUNSEL AND FOR ATTORNEY'S FEES

## TO THE HONORABLE BANKRUPTCY JUDGE:

COMES NOW, Corey Wayne Sauers and Sumer Dawn Sauers, hereinafter referred to as "Debtor(s)", who file this, their *Motion For Substitution of Counsel and For Attorney's Fees*, and in support thereof would respectfully show the Court as follows:

I.

Movant filed a Chapter 13 bankruptcy on June 4, 2016, as a voluntary petition for relief under Chapter 13 of the Bankruptcy Code. Relief was automatically granted.

II.

Lee Law Firm is counsel of record. Debtors have requested that Allmand Law

Firm, PLLC be substituted as counsel of record for the remainder of their case.

III.

This Motion for Substitution of Counsel and For Attorney's Fees is brought by Weldon Reed Allmand of Allmand Law Firm, PLLC, 860 Airport Freeway, Suite 401, Hurst, TX 76054, telephone (214) 265-0123, facsimile (214) 265-1979, who respectfully requests the court to substitute him as counsel of record for Debtor in this case and requests that all attorneys fees not paid be redirected to this firm.

IV.

Corey Wayne Sauers and Sumer Dawn Sauers approves this substitution. This substitution is not sought for delay. To permit the substitution of Allmand Law Firm, PLLC will in no way affect the rights of Debtor(s).

V.

Debtor(s) request that all creditors and parties of interest forward all notices given or required to be given and all papers served or required to be served upon the following:

ALLMAND LAW FIRM, PLLC 860 Airport Freeway, Suite 401 Hurst, TX 76054

WHERFORE PREMISES CONSIDERED, Corey Wayne Sauers and Sumer Dawn Sauers prays that the Court enter an order substituting Allmand Law Firm, PLLC and discharging as attorneys of record for Corey Wayne Sauers and Sumer Dawn Sauers, that all

attorneys fees not paid be redirected to Allmand Law Firm, PLLC and for such other and further relief the Court may deem Debtors justly entitled.

Respectfully Submitted,

ALLMAND LAW FIRM, P.L.L.C.

/s/ Weldon Reed Allmand Weldon Reed Allmand State Bar No. 24027134 ALLMAND LAW FIRM, P.L.L.C. 860 Airport Freeway, Suite 401 Hurst, TX 76054 214.265.0123 Phone 214.265.1979 Fax

ATTORNEY FOR DEBTOR(S)

I approve this substitution.

/s/ Corey Wayne Sauers

COREY WAYNE SAUERS, Debtor

\_\_/s/ Sumer Dawn Sauers\_\_\_\_

**Sumer Dawn Sauers, Joint Debtor** 

## **CERTIFICATE OF SERVICE**

This is to certify that on this January 17, 2019, a true and correct copy of the foregoing Motion to Substitute Counsel and For Attorney's Fees was sent via electronic mail or first class U.S. mail to everyone on the attached mailing matrix.

/s/ Jennifer R Dartez Jennifer R Dartez State Bar No. 33795